

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

KENNETH EMMANUEL LORA

Defendant.

Case No. 1:25-MJ-337

FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANTS**

I, Erik Potrafka, being duly sworn, depose and state the following:

INTRODUCTION

1. This affidavit is submitted in support of a criminal complaint and arrest warrant charging Kenneth LORA with conspiring to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846.

2. I am “an investigative or law enforcement officer” of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. Specifically, I am a Special Agent with the Federal Bureau of Investigation and have been since September 2018. I am currently assigned to the FBI Transnational Organized Crime Eastern Hemisphere Squad, which investigates Darknet illegal narcotics sales and Marketplaces. Prior to this squad, I was assigned to the FBI Violent Crime Task Force which investigates violent crime and threats in the Washington, D.C. area. Specifically,

I have investigated carjackings, Hobbs Act violations, bank robberies, kidnappings, drug trafficking and other crimes of violence. As a part of these investigations, I have participated in the execution of multiple search warrants in which evidence and instrumentalizes of criminal activity has been seized. Additionally, prior to becoming a Special Agent with the FBI, I was a Special Agent with the United States Secret Service, and prior to that, a police officer, advancing to the rank of Detective, with the Glendale Heights, Illinois, Police Department for approximately nine and a half years. I have received training in general law enforcement and federal investigations, to include the execution of search warrants as a part of a criminal investigation.

3. I base the facts set forth in this affidavit upon my personal knowledge, information obtained during my participation in this investigation, review of documents to include business and bank records and official government records, knowledge obtained from other individuals including law enforcement personnel, and communications with others who have personal knowledge of the events and circumstances described herein. Because this affidavit is being submitted for the limited purpose of enabling this Court to support a judicial determination of probable cause for the requested complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish the legal basis for the issuance of criminal complaint and arrest warrant.

FACTS SUPPORTING PROBABLE CAUSE

I. Law Enforcement's Investigation ofTEGRITYPHARMA

4. Since December 2023, The United States, including the FBI, the DEA, the U.S. Postal Inspection Service ("USPIS"), the New York City Police Department (NYPD), U.S. Customs and Border Protection ("CBP"), and Homeland Security Investigations ("HSI") (collectively, the "LAW ENFORCEMENT AGENCIES"), have been conducting a criminal

investigation of a darknet market (“DM”)¹ drug vendor that operates using the moniker “TEGRITYPHARMA” on various darknet marketplaces.

5. As further described below, since January 2024 and as recently as April 2025, law enforcement has conducted multiple controlled purchases of narcotics fromTEGRITYPHARMA. As also detailed below, these purchases, which were shipped to locations within the Eastern District of Virginia and elsewhere, included fentanyl, methamphetamine,² N-Pyrrolidino Etonitazene, and bromazepam, all controlled substances, among others. The controlled purchases include, but are not limited to, pills bearing the appearance of the following.

- a. Pressed Blue M 30s pills³
- b. Pressed Orange Adderall pills
- c. Pressed Green Xanax pills

6. Initial undercover purchases made by FBI Online Covert Employees identified the parcels originating from the New York City area, specifically the Brooklyn and Queens areas of New York City, NY.

¹ A DM is a hidden commercial website that operates on a portion of the Internet that is often referred to as the TOR network, darkweb, or darknet. A DM operates as a black market, selling or brokering transactions involving legal products as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, steroids, and other illicit goods.

² Laboratory analysis has confirmed both methamphetamine and methamphetamine (calc. as hydrochloride). For purposes of clarity and continuity, further analyses will be referred to as “methamphetamine.”

³ The most prolific form of fentanyl seen by law enforcement in this region in recent years is in the form of counterfeit pills containing fentanyl. These pills are typically round blue pills imprinted with “M” and “30” and mimic the markings associated with pharmaceutical oxycodone 30mg pills. Common slang terminology used to reference these counterfeit pills containing fentanyl include, but are not limited to: “Blues”, “M-30s”, “30s”, “Percs”, and “Perc-30s.” “Perc” is a commonly used slang reference that is short for “Percocet” which is a name brand prescription pain killer that contains oxycodone. These counterfeit pills have also been found to at times contain other substances, including Pyrrolidino Etonitazene, heroin, xylazine, and other dangerous controlled substances.

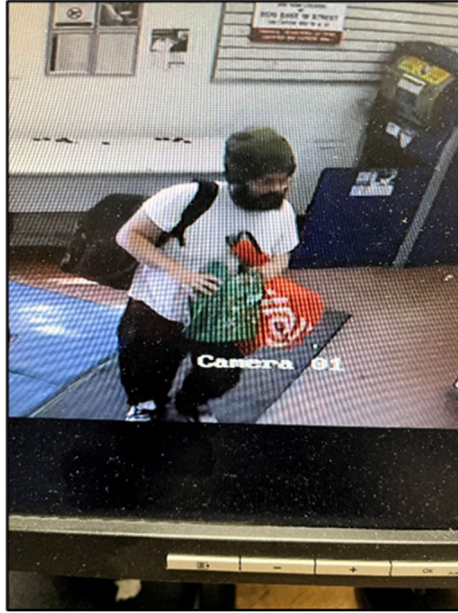
7. The FBI has continued to conduct undercover buys, and seizures of mailings during physical surveillance during this investigative period, and not all undercover purchases from TEGRITYPHARMA are listed in this affidavit. In total, including those drug purchases listed in this affidavit, the FBI and law enforcement has purchased and/or seized approximately 627.86 grams of the green Xanax pressed pills, approximately 1,274.09 grams of the orange pressed pills advertised as “Adderall”, and approximately 62.018 grams of the blue pressed “M 30s”, at least some of which contained fentanyl.

II. Originating Post Office Identified for Shipments Associated with TEGRITYPHARMA

8. On May 8, 2024, at the Homecrest Post Office, located at 2032 Avenue U, Brooklyn, NY, a package that was attributed to a return address used by TEGRITYPHARMA was scanned at the post office. On or about June 13, 2024 the FBI placed a pole camera at the Homecrest Post Office that began capturing the public area in front of the post office. USPIS placed a covert camera on the interior of the post office.

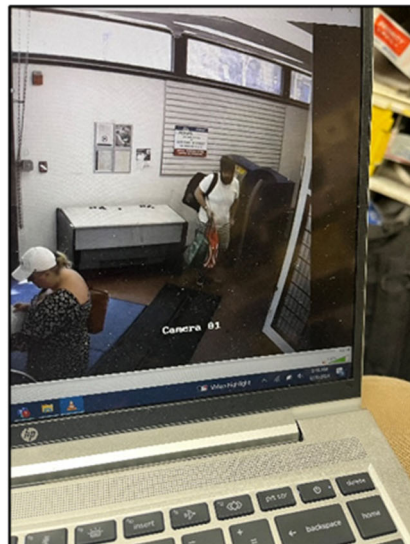
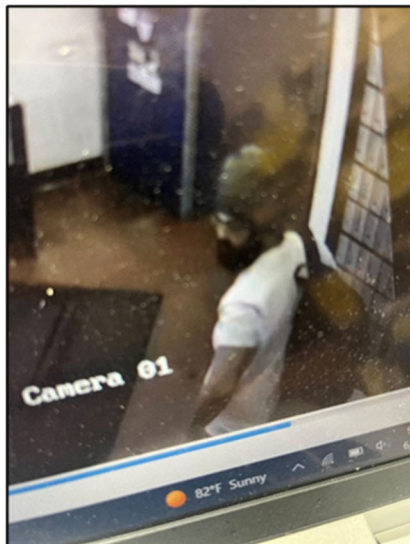
III. Law Enforcement Identifies LORA Mailing TEGRITYPHARMA Shipments

9. On June 18, 2024, USPIS identified an unknown subject (UNSUB-1) dropping several packages at the Homecrest Post Office that bore characteristics of packages sent by TEGRITYPHARMA law enforcement had previously identified. USPIS emailed the affiant videos and still images of the UNSUB suspected of dropping the packages based on a review of the interior camera which had been installed by USPIS.



Screenshot of interior camera footage showing the suspected individual at the Homecrest Post Office on June 18, 2024

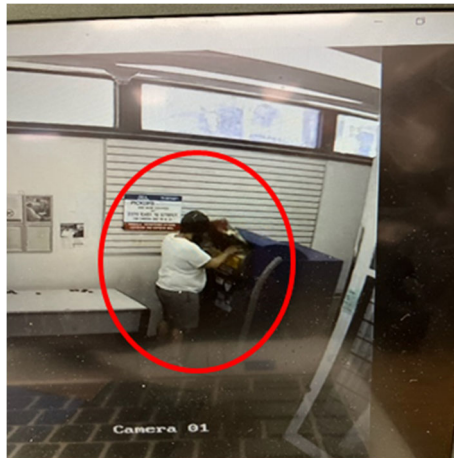
10. On June 27, 2024, at approximately 4:12 p.m., UNSUB-1 dropped several parcels at the post office located at the Homecrest Post Office, which were believed to be attributed to TEGRITYPHARMA.



Screenshots of interior camera footage showing UNSUB-1 dropping off parcels at the Homecrest Post Office on June 27, 2024

11. UNSUB-1 entered the post office at approximately 4:13 p.m., carrying several bags appearing to be filled with parcels, and exited the post office at approximately 4:15 p.m.

12. On July 1, 2024, UNSUB-1 dropped more USPS parcels at the Homecrest Post Office.



Screenshot of interior camera footage showing UNSUB-1 dropping off USPS parcels at the Homecrest Post Office on July 1, 2024

13. On July 1, 2024, USPIS and NYPD were conducting physical surveillance at the Homecrest Post Office and observed UNSUB-1 drop the mailings into the blue bin located inside of the post office.

14. USPIS secured the numerous parcels placed in the blue bin and randomly chose one of the parcels for further examination. USPIS had a K-9 respond to check the parcels, and the K-9 alerted on the parcel, indicating drugs were inside the envelope. USPIS applied for and received a search warrant through the Eastern District of New York (No. 24 MC 2643). USPIS subsequently executed the search warrant and recovered green pressed Xanax bars, which are like the Xanax being offered for sale by TEGRITYPHARMA on the Archetyp darknet market. Lab analysis of the green pressed pills identified it as 251.04 grams of a substance containing Bromazolam.

15. That same day, after LORA dropped off the parcels, the New York Police Department (“NYPD”) followed LORA as he got into the rear passenger seat of a Toyota RAV4. The vehicle was surveilled by NYPD, who observed it ultimately stop in the area of an address on Avenue D in Brooklyn, New York (the “Avenue D Residence”), where LORA exited the vehicle. After conducting a traffic stop of the vehicle, NYPD learned the driver worked for Uber and that the rider, who was dropped off at the Avenue D Residence, had a first name of “Kenneth”.

16. After the vehicle left the area, NYPD conducted a traffic stop of the vehicle and learned the driver worked for Uber. The driver told NYPD the rider who was in the vehicle had a first name of “Kenneth” and the driver dropped Kenneth off at the Avenue D residence.

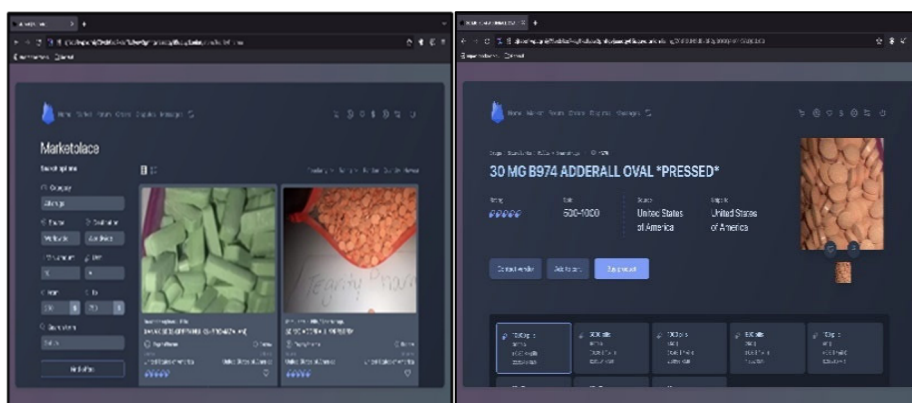
17. According to Uber’s records, the rider on July 1, 2024 between 12:43 p.m. and 1:36 p.m. was Kenneth LORA, with a phone number of 929-xxx-2786 and an email address of yaboykenny@y@gmail.com (LORA’s First Email Address). A copy of the Massachusetts Driver’s License of Kenneth LORA was included on his Uber account, and his payment information was a Visa (Bank of America) card number of 4117-70XX-XXXX-4022. The date of birth listed with the driver’s license was the same date of birth for LORA identified in law enforcement records. Law enforcement records further identified a Kenneth Emmanuel LORA with the same date of birth as using the second account of kennethlora69@gmail.com (LORA’s Second Email Address).

18. Your affiant and other members of the FBI compared the photograph on an expired Massachusetts Identification Card for LORA to UNSUB-1, who was previously identified dropping parcels attributed to darknet vendor TEGRITYPHARMA and noted they appeared to be the same subject.

19. NYPD and USPIS continued to conduct surveillance on LORA from July 1 through July 3, 2024 at the Avenue D Residence. LORA was observed receiving food orders via delivery

drivers and coming outside to smoke an unknown substance. LORA was observed coming and going from the main entry door to the Avenue D residence during this time.

20. On July 14, 2024, an FBI OCE accessed Archtyp to purchase narcotics from TEGRITYPHARMA. OCE identified a listing for “30 MG B974 ADDERALL OVAL *PRESSED*” and initiated an order for 50 pressed Adderall pills, paying .3821 XMR (approximately \$60 USC). The OCE provided a name and address in Washington, DC 20003. The screenshots below are from TegrityPharma’s page on Archtyp showing the pills for sale.



21. On July 16, 2024, USPIS informed your affiant that parcels attributed to the return addresses used by TEGRITYPHARMA were now being identified in the Flushing, Queens area of NY and no longer from the post office located at 2302 Avenue U, in Brooklyn, NY.

22. Your affiant began reviewing Uber records associated with LORA and identified a new common address being utilized by LORA in the area of 233rd St., Cambria Hts., NY. Members of the NYPD responded to this location.

23. Also on July 16, 2024, at approximately 2:00 p.m., NYPD observed LORA exit a black Toyota and walk toward an address on 233rd St., Cambria Hts., NY (Jamaica, Queens), where several packages addressed to LORA were delivered by Amazon, as described below. NYPD conducted a traffic stop of the vehicle a short distance away and learned the driver was

employed by Uber. The driver advised NYPD that the driver had just picked up a rider with the first name of “Kenneth” from a post office located at 8840 164th St., Queens, NY.

24. NYPD went to the post office and located several USPS Priority Mail Flat Rate envelopes in the facility. NYPD also located the parcel addressed to the name provided by the OCE during the purchase of Adderall on July 14, 2024. NYPD seized this parcel. Further, the post office had an interior camera which captured LORA entering the post office at approximately 1:46 p.m. and leaving the post office at approximately 1:47 p.m. on July 16, 2024.

25. The package NYPD seized, was transported to the FBI Northern Virginia Resident Agency (NVRA) where it was opened and processed. The parcel, was a white Priority Mail Flat Rate Envelope with electronic postage affixed to the front. Inside of the envelope was a manilla sealed bubble mailer. Inside of the mailer was a black mylar bag. Inside the bag was a clear heat-sealed bag that contained approximately 50 pressed orange pills with the number “30” pressed on one side and “b 974” pressed on the other. The pills and the clear heat-sealed bag weighed approximately 44.1 grams (total pill and package weight) laboratory analysis conducted by the Drug Enforcement Agency (DEA) Mid-Atlantic Laboratory (MAL) identified 21.11g of a substance containing Methamphetamine.

IV. Amazon Records Reveal LORA Purchasing Packing Materials Associated withTEGRITYPHARMA Drug Shipments

26. According to Amazon’s records, LORA’s Second Email Address is associated with an Amazon account under the name Kenneth LORA and 929-xxx-2786. This account has been active since May 21, 2019. This account is associated with several addresses where Amazon deliveries were made, including a residence on 233rd St. in Cambria Hts., NY, where LORA was surveilled on July 16, 2024, as referenced above. The last address used to receive orders was on

Lauren Ct. in Jamaica Queens, NY, (hereinafter the “Lauren Ct. Residence”) . This account was used to buy the following, among other items, shipped to LORA at the Lauren Ct. Residence:

a. November 20, 2024: one (1) Avery Half Sheet Printable Shipping Labels, 5.5" x 8.5", White, 500 Blank Mailing Labels, Great for Packages, Product Labels, Organization, and More (95930), which according to Amazon records were shipped to LORA at the Lauren Ct. Residence;

b. December 30, 2024: two (2) Syntus 200 Count Vacuum Sealer Bags Quart 8 x 12 inch for Seal a Meal, Commercial Grade BPA Free Heavy Duty Precut Seal Bags, Food Vac Bags for Storage, Meal Prep or Sous Vide, which according to Amazon records were shipped to LORA at the Lauren Ct. Residence;

c. January 17, 2025: one (1) 100 Pack Mylar Bags 5.9 x 8.7 Inch Resealable Smell Proof Bags Foil Pouch Bag Flat Bag Matte Black, which according to Amazon records were shipped to LORA at the Lauren Ct. Residence;

d. January 25, 2025: one (1) packbabol Kraft Bubble Mailers 6x10 Inch 100 Pcs, Small Self-Sealing Mail Shipping Bags, Yellow Padded Envelopes #0, which according to Amazon records were shipped to LORA at the Lauren Ct. Residence; and

e. On February 14, 2025: two (2) packbabol Kraft Bubble Mailers 6x10 Inch 100 Pcs, Small Self-Sealing Mail Shipping Bags, Yellow Padded Envelopes #0, which according to Amazon records were shipped to LORA at the Lauren Ct. Residence.

27. In my knowledge, training, and experience, the materials listed above are consistent with a large-scale narcotics packaging and shipping operation. And they are consistent with the packaging that FBI recovered in undercover buys from TEGRITYPHARMA, including those described herein.

V. Co-Conspirators Arrange Suspected Delivery of Narcotics, Transfer Thousands of Dollars in Suspected Proceeds, and Assist LORA in Overnight Move

28. At least two co-conspirators of LORA have been identified, whom law enforcement submits there is probable to believe have assisted LORA in furthering the goals of the conspiracy, including by obtaining methamphetamine from sources of supply and covertly moving stash house locations.

a. TEGRITYPHARMA Advertises Itself as Vendor Utilizing Multiple Individuals to Further its Controlled Substance Distribution

29. During the course of the investigation, law enforcement reviewed posts made on the Archetyp as well as the Darknet Chat Forum “Dread” that referenced the vendor TEGRITYPHARMA. This review identified in excess of 100 posts by users discussing drugs and the vendor TEGRITYPHARMA and responses by TEGRITYPHARMA. In numerous posts, posts claimed to be made by those associated with TEGRITYPHARMA claim to be a multi-person operation.

30. For example, in a thread titled “TPharma Green Hulks Xanax (Bromazolam)” the account “Tpharma” responded to a complaint “Hey sorry boss, we were moving the operation this whole past week been super busy, but were good!”

31. In response to another post titled “Free K pack in mail” an account associated with TEGRITYPHARMA posted “Im gonna have to talk with my shipping team man.”

32. TEGRITYPHARMA further self-advertised across Archetyp and Dread. For example, TEGRITYPHARMA wrote in a listing for pressed Adderall pills on Archetyp market “ANYONE WHO BUYS OR HAS BOUGHT OUR PILLS AND LEAVES US A REVIEW ON DREAD WILL GET 50 EXTRA PILLS ADDED TO THEIR NEXT ORDER FOR FREE (ONLY 1 PERSON CUSTOMER).” (emphasis in original).

33. Based on these statements and other evidence gathered in the investigation, your affiant believes the operation of TEGRITYPHARMA to be the work of multiple individuals conspiring to distribute controlled substances.

b. Co-Conspirators Move LORA between Apartments in New York in a Rented Vehicle During Nighttime Hours

34. For example, UCC-1 has been identified as a resident of Lynn, Massachusetts. On or about August 11, 2024 law enforcement observed LORA, UCC-1, and another uncharged coconspirator moving property out of the basement unit at the Cambria Heights where LORA had been residing. In particular, UCC-1 was observed moving large bins from LORA's residence between approximately 1:00 a.m. and 3:00 a.m. Your affiant believes this activity occurred at this time of day to avoid detection of the movement of narcotics from LORA's residence. UCC-1, LORA, and the third conspirator were later identified entering a gray Honda CRV and utilizing it to convey property from the Cambria Heights apartment to a new residence associated with LORA.

35. Text messages obtained via an iCloud search warrant for an account associated with UCC-1 further show UCC-1 coordinating the rental of a Honda CRV the day before the activity described above. Specifically, on August 10, 2024, UCC-1 contacted another uncharged conspirator, UCC-2, who has been identified as a resident of Danvers, Massachusetts, stating "still need to book it brotha." UCC-1 added, in part, "we can do the 2019 crv so you can save some money compared to the 2020 pilot." UCC-2 responded, agreeing to the CRV and indicating he would send payment to UCC-1 via Zelle.

c. Co-Conspirators Arrange for Delivery of Suspected Narcotics

36. Further review of the iCloud data associated with UCC-1 identified iMessages between UCC-1 and UCC-2 from months earlier, on or about May 9, 2024, appearing to coordinate the movement of narcotics. Specifically, on that date, UCC-2 messaged UCC-1 he gonna send

addy in the morning he said so I'll lyk first thing." Your affiant understands "addy" to mean Adderall, which, as explained above, TEGRITYPHARMA advertised for sale on its darknet vendor page.

37. Shortly thereafter, UCC-2 messaged UCC-2 stating a person referred to as "[h]e" could meet UCC-1 now and provided detailed instructions on how to deliver of an undescribed substance by backing a vehicle against a wall, popping the trunk, and not exiting the vehicle, in exchange for "cheddar." UCC-2 further brokered the transaction as it occurred in the messages. Law enforcement believes the substance, described only as "it" therein, to be the Adderall discussed earlier in the day. Your affiant understands the reference to "cheddar" to mean that KABLE would receive payment. The conversation between the two included the following:

SENDER	MESSAGE CONTENT
UCC-1	Yo any word or na?
UCC-2	Yeah he said you can go meet him now at [a residential address] in Lynn He said just have it in the trunk and pop it and dude will grab When he gets there he gotta back up to the wall it's like those street divider walls That's what he said So your trunk is against the wall
UCC-1	So don't get out of my car?
UCC-2	Nope you don't have to brotha Just pop trunk and hell grab it Lmk eta so I can tell dude
UCC-1	Like 10 min
UCC-2	Ok He'll be there Lmk right when you pull up
UCC-1	Just got here
UCC-2	Ok he's coming now He said you can pop now
UCC-1	It already is I'm waiting for him to come out
UCC-2	Ok
UCC-1	We good
UCC-2	Savage I'll link with you later to toss you the cheddar

d. Co-Conspirators Utilize Encrypted Messaging Applications

38. While certain communications, like those described above, between UCC-1 and UCC-2 occurred via iMessage, your affiant is further aware that subjects in this investigation utilize the encrypted application Signal to communicate. In particular, on October 27, 2022, and June 11, 2024, iMessages between UCC-2 and UCC-1 show the conversation is directed to the encrypted application Signal. For example, on or about October 27, 2022, UCC-2 wrote UCC-1 via iMessage “So you Deff gonna go? Just so I can have the cash ready for you when you come pick up the stock. Lmk when on signal” UCC-1 responded “I got it.”

39. Signal is an open-source, encrypted messaging service for instant messaging, voice calls, and video calls. Through training and experience, your Affiant is aware some users of Signal utilize it to hide their illegal activity from law enforcement.

e. Co-Conspirators Procure Shipping Materials for LORA of the Kind Associated with Shipments byTEGRITYPHARMA

40. A review of LORA's Amazon account activity from June 14, 2024, showed an attempted purchase, which was canceled, for a HP Black High-yield ink cartridge, 100 black mylar bags, Scotch heavy duty shipping tape, PEIPU Nitrile exam gloves, and Clorox disinfecting wipes. This is the same drug packaging, as seen in FBI previous undercover buys fromTEGRITYPHARMA, and items seen routinely purchased by LORA. This particular attempted purchase identified a Mastercard credit card, and the name of UCC-2 associated with the canceled purchase.

f. Financial Analysis Reveals Significant Movement of Suspected Proceeds Between UCC-2 and LORA

41. From September 2019 through December 2024, UCC-2 sent a total of \$116,792 in Zelle payments to 26 individuals. These payments included approximately a total of \$24,356 to LORA.

VI. *Law Enforcement Surveils LORA, Leading to the Seizure of Controlled Substances Shipped by LORA, Including Those Purchased by Law Enforcement from TEGRITYPHARMA*

42. On July 19, 2024, NYPD and USPIS were conducting surveillance of LORA and observed him take an Uber to post offices located in Hyde Park, NY and Franklin Park, NY.

43. During this physical surveillance, NYPD and USPIS observed LORA deposit several parcels into the United States Postal stream. Two mailings were seized by Law Enforcement and USPIS obtained a search warrant out of the Eastern District of New York (EDNY) 24 MC 2966 to search the parcels. The results of the search warrant identified green pressed pills, approximately 373.72 grams of a substance containing Bromazolam and orange pressed pills, approximately 360.8 grams of a substance containing Methamphetamine. Analysis of these items was conducted by the USPIS laboratory.

44. On September 10, 2024, LORA moved to a new residence, the Lauren Ct. Residence.

45. On January 28, 2025, an FBI OCE placed an undercover order for 500 "30 MG B974 ADDERALL OVAL *PRESSED*" while present in the EDVA.

46. At or around January 28, 2025, a second undercover order for 50 "30 MG B974 ADDERALL OVAL *PRESSED*" was made by Law Enforcement in New York City.

47. On January 31, 2025, Law Enforcement was conducting surveillance of LORA at the Lauren Ct. Residence, and observed him exit the residence carrying a black backpack which appeared to be weighted with suspected mailing parcels.

48. Law enforcement surveilled LORA to a post office located at 193-04 Horace Harding Expressway, Flushing, New York 11365. LORA was observed on a camera located in the interior of the post office, opening his bag and depositing approximately 27 USPS mailings which

all had the same return address. Located within the mailings, were the two parcels addressed to the FBI OCE provided name and address and the other Law Enforcement Undercover provided name and address. Law Enforcement marked the FBI Undercover purchase and returned it to the mail stream to be delivered to the provided address located in Washington, D.C.

49. The FBI OCE undercover purchase was retrieved from an undercover mailbox in Washington, D.C. and was processed. DEA MAL analysis of the pressed orange pills indicated it was 180.2 grams of a substance containing Methamphetamine.

50. The New York Law Enforcement Undercover parcel was processed by Law Enforcement in New York and lab results identified it as 26.7 grams of a substance containing Methamphetamine.

51. On April 6, 2025, and April 8, 2025, FBI OCEs, while physically in the EDVA, placed two separate undercover buys for 500 "30 MG B974 ADDERALL OVAL *PRESSED*" each.

52. On April 10, 2025, your affiant and other members of Law Enforcement were conducting surveillance of LORA at the Lauren Ct. Residence.

53. At approximately 11:51 AM, LORA exited the Lauren Ct. Residence and entered the rear passenger seat of a black Lucid sedan.

54. Law Enforcement surveilled the vehicle until it came to a stop on Hempstead Turnpike, in Franklin Square, New York. LORA exited the vehicle and went into a post office located at 867 Hempstead Turnpike, Franklin Square, NY. LORA then removed multiple USPS Priority envelopes from his backpack and deposited them in a collection bin located in the lobby. LORA then exited the post office.

55. Law Enforcement secured the bin, and after an examination of the bin, located the two undercover purchases made by FBI OCEs on April 6, 2025, and April 8, 2025, along with approximately 13 other mailings having the same return address. Two random mailings were selected by Law Enforcement for examination and application for a search warrant out of Southern District of New York. The FBI OCE mailings were initialed by Law Enforcement and placed back into the USPS mailing stream to be delivered to the Undercover mailboxes located in Washington, D.C.

56. On April 16, 2025, and April 17, 2025, the two FBI Undercover purchases were retrieved from Undercover mailboxes located in Washington, D.C. The two parcels were opened and processed and ultimately sent to the DEA MAL for analysis. DEA MAL identified the first Undercover purchase from April 6, 2025, as being 150.22 grams of a substance containing Methamphetamine, and the second Undercover purchase placed on April 8, 2025, as being 150.20 grams of a substance containing Methamphetamine.

57. On April 21, 2025, USPIS and NYPD executed SDNY search warrant 25 Mag 1212 on the two parcels seized on April 10, 2025. The two parcels were examined and the following was identified during the search:

- a. Parcel 1: Addressed to an individual in Miami Lakes, Florida. The contents of this parcel were identified as pressed orange pills with the letters “AD” pressed on one side and the number “30” pressed on the other. The total package weight was identified as 70.874 grams, analysis pending.
- b. Parcel 2: Addressed to an individual in Arlington, Texas. The contents of this parcel were identified as pressed orange pills with the letters “AD”

pressed on one side and the number “30” pressed on the other. The total package weight was identified as 160.175 grams, analysis pending.

58. On April 16, 2025, Law Enforcement was conducting surveillance of LORA at the Lauren Ct. Residence, when LORA was observed exiting the residence, and entering a vehicle which took LORA to the Jackson Heights Post Office, 7802 Jackson Heights, NY 11372.

59. Law Enforcement observed LORA deposit approximately 17 mailings into a deposit bin located inside of the post office.

60. USPIS and NYPD secured one of the mailings for further examination, which was addressed to an individual in Missoula, Montana. At or around April 23, 2025, USPIS examined the parcel pursuant to SDNY search warrant 25 Mag 1321. The contents of this parcel were identified as pressed orange pills with the letters “AD” pressed on one side and the number “30” pressed on the other. The total package weight was identified as 41.107 grams, analysis pending.

61. In my knowledge, training, and experience, online narcotics traffickers will frequently change the post offices that they use to ship narcotics, to avoid detection. Similarly, narcotics traffickers can and sometimes will change where they live both to avoid detection and to make narcotics trafficking easier.

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CONCLUSION

62. Based on the facts set forth above, I respectfully submit that there is probable cause to believe that between at least as early as May 2024 and continuing to at least April 2025, within the Eastern District of Virginia and elsewhere, Kenneth LORA did knowingly and intentionally conspire with others, known and unknown, to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

Respectfully submitted,



Erik Potrafka
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me in
accordance with Fed. R. Crim. P. 4.1
by telephone this 2nd day of June 2025.



Honorable William B. Porter
United States Magistrate Judge